



February 6, 2025

The Honorable David A. Bennett
House Committee on Environment and Natural Resources
Room 101
82 Smith Street
Providence, RI 02903

RE: The American Biogas Council Opposes HB 5167. Urges Inclusion of Renewable Natural Gas and Hydrogen.

Dear Chairman Bennett and members of the Committee,

The American Biogas Council (ABC) appreciates the opportunity to comment on HB 5167, the proposed Rhode Island Clean Heat Standard Act. As a representative body for the U.S. biogas industry, we are committed to supporting Rhode Island's decarbonization goals while advocating for the inclusion of viable, low-carbon fuels such as Renewable Natural Gas (RNG), Hydrogen, and other advanced heating fuels derived from organic waste.

Currently, HB 5167 prohibits the use of RNG and hydrogen as a "clean heat measure." ABC believes that excluding RNG and hydrogen in this legislation is placing limitations on Rhode Island's decarbonization future. RNG is produced from organic waste sources such as landfills, wastewater treatment plants, agricultural residues, and food waste. In the production of RNG, methane is captured and repurposed into renewable energy, instead of escaping into the atmosphere, often creating a carbon negative heating fuel. RNG is interchangeable with conventional natural gas, meaning the existing pipeline and storage infrastructure can deliver clean energy to heat homes in Rhode Island, and homeowners do not bear the burden of new appliances and the costs associated with those retrofits. Clean Fuel Standards are best designed as a fuel supply-based policy, decarbonizing the energy supply, rather than dictating onerous end use restrictions. This has been long demonstrated by Renewable Portfolio Standards, whereby the electric supply is decarbonized, and all technologies compete on a least-cost basis. When building a Clean Heat program, a diversified and technology neutral energy portfolio is essential for resilience, affordability, and long-term sustainability to ensure decarbonization goals are met.

We recognize the significance of early action to reduce greenhouse gas emissions associated with energy, in many sectors across Rhode Island's economy. However, we urge this committee to consider the limitations this legislation places on the state to utilize all clean energy sources. Clean energy sources such as RNG and hydrogen are essential parts of delivering a low carbon future in Rhode Island and should be fully utilized in the proposed clean heat standard. There are creative policies emerging across North America that are balancing the value of RNG and hydrogen with the delivery of cleaner molecules and the desire to electrify certain end uses. We appreciate the bill sponsors' passion for clean energy and a clean heat standard, but the ABC feels this legislation would be counterproductive, severely limiting current and future opportunities for Rhode Island to decarbonize cost effectively.

We welcome the opportunity to work with the committee and the legislature on these topics and thank you for the opportunity to comment on this matter.

Sincerely,

Jonathan Harding

State Policy Manager

About the American Biogas Council

The American Biogas Council is the voice of the US biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies in all parts of the biogas supply chain who are leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they recycle organic material into renewable energy and soil products. Learn more online at www.AmericanBiogasCouncil.org, Twitter [@ambiogascouncil](https://twitter.com/ambiogascouncil), and [LinkedIn](https://www.linkedin.com/company/ambiogascouncil/)

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